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March 2, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

Re: CC Dkt. 95-116, Wireless Number Portability

Dear Ms. Dortch,

On March 2, the undersigned, Kathie Levitz, Bill Shaughnessy, and Mo Andriate of BellSouth met with Eric Einhorn, Pam Slipakoff and Cheryl Callahan of the Wireline Competition Bureau; Jared Carlson and Jennifer Salhus of the Wireless Telecommunications Bureau; and, Thomas Wyatt, Martha Contee, Bert Weintraub, Nancy Stevenson and David Marks of the Consumer and Governmental Affairs Bureau. The purpose of the meeting was to share BellSouth's experience to-date with intermodal WLNP and provide an analysis of various problems encountered. All material provided during the meeting is attached.

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions regarding this filing please do not hesitate to contact me at (202) 463-4109 or Kathie Levitz at (202) 463-4113.

Sincerely,



Mary L. Henze

Attachments

cc: E. Einhorn T. Wyatt
P. Slipakoff M. Contee
C. Callahan B. Weintraub
J. Carlson N. Stevenson
J. Salhus D. Marks

BellSouth Analysis of WLNP Intermodal Issues

- 1) **Purpose:**
 - a) Provide analysis on intermodal porting problems experienced by BellSouth
- 2) **Background:**
 - a) On 10/10/2003, BellSouth filed written ex parte:
 - (1) Summarizing BellSouth's Communication Plan for WLNP implementation;
 - (2) Providing a status of inter-company testing between BellSouth and Wireless Service Providers (WSPs);
 - (3) Providing a status of coordination effort between BellSouth and Specific WSPs to facilitate WLNP;
 - (4) Key points:
 - (a) In September 2003, BellSouth offered instructor led training classes to help WSPs implement WLNP processes including how to complete LSRs. (Training has been available since September. No charge for training September through January.)
 - (b) BellSouth is adhering to wireline porting processes, flows and intervals as originally adopted by NANC and codified by FCC in Section 52.26 (a) of its rules.
 - b) On 10/14/2003, BellSouth did an ex parte explaining wireline porting process and intervals.
 - (1) Key points:
 - (a) LSR and FOC exchange must be finalized prior to the New Service Provider sending the new Service Provider Subscription Version Create message and the subsequent activation of port in NPAC;
 - (b) Receipt of activate message that is associated with a valid LSR drives disconnect process in BellSouth
 - c) On 1/20/04 BellSouth filed comments on the FNPRM (Docket 95-116) dealing with WLNP issues:
 - (1) BellSouth specifically noted two types of intermodal porting problems:
 - (a) Ports from BellSouth to WSPs are activated prior to the WSP receiving a FOC "accept."
 - (b) FOCs on port-ins to BellSouth sent to incorrect locations.
- 3) **Quantify the Intermodal Porting Problems:**
 - a) Customer Appeals:
 - (1) BellSouth has received 109 WLNP customer appeals:

(a) Executive:	28
(b) FCC:	44
(c) PSC:	26
(d) Misc:	11
 - (2) Ninety-three appeals involved WSPs using the same service bureau for LSR/FOC processing.
 - (3) Our investigation indicates that:
 - (a) 38 appeals involved situations where no LSR was received.
 - (b) 13 appeals involved delays in receiving the LSR.
 - (c) 27 appeals involved situations where the WSP has not responded to clarification, rejection, or the TN was not ported by the WSP
 - (d) 6 appeals involved porting from a wireless service provider to another wireless service provider.
 - (e) 25 appeals involved 'other' situations.
 - (4) Appeals by month:
 - (a) 14 appeals received in 12/03
 - (b) 47 appeals received in 01/04

- (c) 48 appeals received in 02/04
 - b) Intermodal Port Problems:
 - (1) Wireline to Wireless Ports:
 - (a) As of 2/6/04, 628 TNs have been ported from BellSouth and activated in the NPAC without BellSouth receiving a valid LSR and/or returning the FOC “accept”.
 - (i) December 03: 257
 - (ii) January 04: 342
 - (iii) Feb (through 2/5/04): 29
 - (b) 91% of these ports without a LSR and/or valid FOC involve WSPs that use the same service.
 - (c) Results in customer being in “half-port” status:
 - (i) Call origination can occur from either landline or wireless set.
 - (ii) Terminating calls are split between landline (intra-switch) and wireless (inter-switch) sets.
 - (iii) Mixed service E911 condition exists.
 - (iv) Dual billing – customer billed for both landline and wireless service.
 - (2) Wireless to Wireline Ports:
 - (a) Successfully ported 28 customers from WSPs to BST.
 - (b) We have currently 88 pending orders in End User Migration Center.
 - (c) Established interim steps to address dual fax number issue.
 - (3) In Jan 2004, 91% (1390 out of 1520) of total calls to LCSC involved WLNP ports:
 - (a) Misdirected Calls: 306
 - (b) LSR/PON/CSR info: 259
 - (c) LNP Info: 296
 - (d) Clarification: 155
 - (e) FOC: 27
 - (f) Administrative: 26
 - c) Total Ports from BST to WSPs:
 - (1) Through 2/18/04, approximately 1458 wireline to wireless ports with valid LSRs.
- 4) **BellSouth Action:**
- a) Continue “day-to-day” dialogue with WSPs.
 - b) Create WSP ‘*Who To Call*’ reference matrix based on scenarios. For example, scenarios include:
 - (1) *Who should I contact if I have questions about a reject / clarification message I received after I submitted a LSR to BellSouth?*
 - (2) *How do I get access to BellSouth Customer Service Records for my pre-order look-up?*
 - (3) *I sent BellSouth a LSR on this TN last week but BellSouth never responded. Who can I talk to about this?*
 - c) Increase Communication:
 - (1) Based on “root cause” analysis:
 - (a) Selectively sent letters to WSPs on 02/23/04:
 - (i) Asked high level management of WSPs requesting their assistance to:
 - 1. Adhere to nationally established wireline to wireless porting processes;
 - 2. Submit a Local Service Request to BellSouth’s Local Carrier Service Center;

3. Not issue a Subscription Version message to the Number Portability Administration Center until BellSouth provides a Firm Order Confirmation “accept” with a due date;
 - (b) Requested an action plan in the letter to close process gaps by March 5, 2004.
 - (c) Also provided contact names and numbers in the letter for WSPs to call to request additional training needs, and / or seek help with non-training and technical questions.
- 5) **Next Steps:**
 - a) Address Backlog of “half-port” TNs:
 - (1) BellSouth has established an interim process to address “backlog” of TNs that have been “half-ported”:
 - (a) Process is manual.
 - (b) Process involves working with the WSP on a one-to-one coordinated basis.
 - (c) Process results in minimal disruption to customer.
 - (d) BellSouth has successfully tested the process with one WSP.
 - (e) BellSouth will be working with additional WSPs.
 - b) Prevent future customer appeals:
 - (1) Does existing process need to be changed?
 - (a) EX. PIM 22
 - c) Work with Industry:
 - (1) Industry Forums and USTA
- 6) **Summary:**
 - a) BellSouth’s ‘root cause’ analysis indicates that most WLNP porting problems involve:
 - (1) WSPs using the same service bureau. Third party vendors not communicating BellSouth messages back to WSP
 - (2) Ports from BellSouth to WSPs activated prior to the WSP, or their authorized service bureau, receiving a Firm Order Confirmation.
 - b) WSPs appear to be making varying degrees of progress on root-cause analysis of problem ports. Some have fully addressed, but others are just getting started.
 - c) BellSouth is proactive in addressing WLNP porting issues. However, to prevent or eliminate future problems, WSPs must ensure that the service bureau acting on their behalf follow industry processes and flows.

BellSouth Wireless Local Number Portability Resource Sheet

For Carrier ABC – updated 2-20-04

WLNP FAQs for Carrier ABC	
Q. Where can I find general information about Wireless Local Number Portability	<p>A. The BellSouth WLNP Web site http://www.interconnection.bellsouth.com/products/wireless/wlnp/index.html</p> <ul style="list-style-type: none">• B. The NPAC web site www.napac.com
Q. How do I exchange Porting Profile information with BellSouth?	<p>A. The Porting Profile is on the WLNP Web site, see Overview section: http://www.interconnection.bellsouth.com/products/wireless/wlnp/porting_req_overview.html</p> <p>B. Please email your completed profile to xxx@bellsouth.com</p>
Q. What LSR fees apply to porting orders submitted to BellSouth?	<p>A. SOMAN & SOMECH charges apply: LSRs submitted electronically via LENS, EDI, or TAG = \$3.50 LSRs submitted via FAX = \$19.95</p>
Q. How do I establish a Miscellaneous Billing Account with BellSouth?	<p>A. Contact your BellSouth Wireless Account Team: ABC xxx-xxx-xxxx</p>
Q. How can I get training on completing and submitting porting requests to BellSouth?	<p>A. Training information on WLNP Web site: http://www.interconnection.bellsouth.com/products/wireless/wlnp/training.html</p> <ul style="list-style-type: none">• To download free training materials, go to http://www.interconnection.bellsouth.com/products/wireless/wlnp/training.html
Q. Where can I find information on completing the Local Service Request to port a wireline number to my wireless company?	<p>A. See the BellSouth Local Ordering Handbook http://www.interconnection.bellsouth.com/guides/leo/bbrlo_releases/140/index.html</p>

BellSouth Wireless Local Number Portability Resource Sheet

For Carrier ABC – updated 2-20-04

WLNP FAQs for Carrier ABC	
Q. How do I get access to the BellSouth on-line ordering interface LENS? password and user ID ?	<p>A. For a LENS user name and password, contact your BellSouth Wireless Account Team to complete a copy of a RF-1217. This form is on the WLNP web site. Completed forms should be emailed to: ABC xxx-xxx-xxxx</p> <p>Link to form RF 1217 http://webforms.bst.bls.com/eforms/forms/rf1217_10-2003.htm</p> <p>Note: this is a 2-page form with authorized user identification on second page.</p>
Q. How do I get access to BellSouth Customer Service Records for my pre-order look-up?	<p>A. First complete and return a Letter of Authorization. This is required to protect confidentiality of customer information when the WSP performs pre-order look-up to complete the LSR. The Letter of Authorization is on the WLNP web site. Link to Letter of Authorization on WLNP site http://www.interconnection.bellsouth.com/products/wireless/wlnp/porting_req_overview.html</p> <p>Letters of Authorization should be sent to: ABC xxx-xxx-xxxx</p>
Q. Where should I send FAX (manual) orders?	<p>BellSouth LCSC FAX number: ABC xxx-xxx-xxxx</p>
Q. Who should I contact if I have questions about a REJECT message I received after I submitted a LSR to BellSouth?	<p>A. If you use a third party vendor, first ensure that the message is from BellSouth and not the vendor</p> <ul style="list-style-type: none"> • If the error message is from BellSouth, first consult the Local Ordering Handbook at http://www.interconnection.bellsouth.com/guides/leo/bbrlo_releases/14_0/index.html • If you still have questions, please call a BellSouth Local Support Manager at a local support manager at ABC xxx-xxx-xxxx
Q. Who should I contact if I have questions about a CLARIFICATION message I received after I submitted a LSR to BellSouth?	A. Please call ABC xxx-xxx-xxxx
Q. I seem to keep getting the same error message on LSRs I submit to BellSouth. Who should I call for help?	A. Customer Service Manager ABC xxx-xxx-xxxx
Q. Where can I find BellSouth's escalation process with names, phone numbers, etc.?	A. http://www.interconnection.bellsouth.com/centers/html/lcsc.html

BellSouth Wireless Local Number Portability Resource Sheet

For Carrier ABC – updated 2-20-04

WLNP FAQs for Carrier ABC	
Q. I have Type 1 Numbers. How can I access the BellSouth web-based Line Loss Report?	A. Contact your BellSouth Wireless Account team to establish a password and access to this site. ABC xxx-xxx-xxxx
Q. Where can I find updates on BellSouth's WLNP processes?	A. The Carrier Notification section of the BellSouth WLNP web site http://www.interconnection.bellsouth.com/products/wireless/wlnp/carrier_ltrs.html
Q. I sent BellSouth a LSR on this TN last week but BellSouth never responded. Who can I talk to about this?	A. If you use a 3 rd party vendor, first ensure that your vendor submitted the LSR to BellSouth. <ul style="list-style-type: none"> • If the LSR was submitted to BellSouth, please call ABC xxx-xxx-xxxx • You will need your PON number (order number)
Q. I have a list of Orders that are "stuck" in the NPAC. I received an FOC and due date, I submitted my SV Activate, but BellSouth is not releasing the number. Who can I talk to about this?	A. Please call ABC xxx-xxx-xxxx <ul style="list-style-type: none"> • You will need your PON numbers (order numbers)
Q. I have an executive complaint/FCC complaint as a result of a wireline to wireless porting issue. Who can I work with at BellSouth "real time" to get this resolved?	A. Please call ABC xxx-xxx-xxxx <ul style="list-style-type: none"> • You will need your PON number (order number)
Q. I ported a BellSouth wireline number in error (a typo). Who can I work with at BellSouth to get it turned around?	A. Please call ABC xxx-xxx-xxxx
Q. BellSouth ported this number to BellSouth in error (a typo). Who can I work with at BellSouth to get this turned around?	A. Please call the Trapper Center ABC xxx-xxx-xxxx

BellSouth Wireless Local Number Portability Resource Sheet

For Carrier ABC – updated 2-20-04

WLNP FAQs for Carrier ABC	
Q. BellSouth is not routing calls to these wireless numbers I ported in from another wireless carrier. Who can I call to get these calls routed properly?	A. Please call the wireless ACAC ABC xxx-xxx-xxxx
Q. I realize I have several numbers that ported but I did not submit a LSR to BellSouth. The end user is half-porting and only receiving wireless calls. Who can I work with at BellSouth to get these numbers ported properly?	A. Please call ABC xxx-xxx-xxxx

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October 9, 2003

William Maher
Chief of the Wireline Competition Bureau
Federal Communications Bureau
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Washington, D.C. 20554

John B. Muleta
Chief of the Wireless Telecommunications Bureau
Federal Communications Bureau
445 12th Street, SW
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Re: Wireless Number Portability -- CC Docket 95-116

Gentlemen:

This letter responds to the letters of September 23, 2003 that AT&T Wireless Services, Inc. (AWS) and Verizon Wireless filed with the Commission regarding wireless local number portability (WLNP). The purpose of BellSouth's letter is to: 1) explain the communication plan developed by BellSouth to facilitate porting between BellSouth and wireless service providers; 2) present the status of inter-company testing between BellSouth and wireless service providers, and; 3) present the status of the coordination efforts between BellSouth and specific wireless providers.

1. Summary of BellSouth's Communication Plan for WLNP Implementation

In March 2003, BellSouth contacted its entire list of wireless customers to let each customer know that BellSouth would be ready to process carrier orders for Wireless Local Number Portability (WLNP) beginning Nov. 24, 2003, as required by the Federal Communications Commission in its July 26, 2002 order in CC Docket No. 95-116 (FCC 02-215). In that correspondence, BellSouth also indicated that it would support WLNP for CMRS providers through BellSouth's wholesale business unit, BellSouth Interconnection Services. The notification listed the URL for the WLNP Web site that BellSouth has established to address wireless porting issues:

<http://www.interconnection.bellsouth.com/products/wireless/wlnp/index.html>.
BellSouth included the same information in an April 10, 2003 press release.

The BellSouth WLNP website became operational in March 2003. The purpose of the website is to describe to CMRS providers how BellSouth will interact with them to provide WLNP. The website includes information on BellSouth's WLNP ordering and provisioning process; WLNP porting scenarios; migration of Type 1 numbers; steps a CMRS provider must take to prepare for porting; testing procedures and testing availability with BellSouth. The site reaffirms BellSouth's compliance with, the Commission's rules that codify industry standards and intervals for wireline number portability for all wireless ports that involve a BellSouth wireline number. BellSouth has continued to update the website to include new information as it becomes available. For example, in August 2003 BellSouth updated the website to include a step-by-step guide for establishing an automated ordering interface with BellSouth.

In April 2003, BellSouth initiated a second direct mailing to officer level executives of our CMRS provider customers that reiterated points made in the March 2003 letter. BellSouth emphasized that it would adhere to wireline porting processes and flows based on national agreements at the NANC's Local Number Portability Administration Working Group to support all wireless porting scenarios. The notice also reminded all CMRS providers that they must independently establish an account with NeuStar, the WLNP Administrator managing the Number Portability Administration Center (NPAC). NeuStar maintains the NPAC database containing all information required for correct call routing when a customer changes from one service provider to another. Finally, the letter recommended that each CMRS provider contact its BellSouth account executive and visit our WLNP website for additional information.

In May 2003, BellSouth sent to each of our CMRS provider customers a letter outlining the available Local Service Request (LSR) process and electronic ordering interface options. The letter noted that CMRS providers must submit its LSRs to BellSouth's Local Carrier Service Center (LCSC) either via FAX or via electronic ordering interface. The letter further listed the ordering interfaces and identified those interfaces that must be tested prior to submitting an order. Finally, the letter explained that BellSouth Interconnection Services would offer testing for ordering interfaces and fee-based training on the use of both BellSouth's Local Exchange Navigation System (LENS) interface and the LSR form.

In July 2003, BellSouth informed our CMRS provider customers of the challenges posed by porting numbers associated with Type 1 interconnection arrangements and recommended that CMRS providers migrate their Type 1 numbers to Type 2 interconnection arrangements¹ prior to November 24, 2003. We presented various options for migrating Type 1 numbers and recommended that each CMRS provider customer contact its BellSouth wireless account team. Migration via disconnect, code

¹ The Type 1 interconnection is at the Point of Interface (POI) of a trunk between a wireless service provider (WSP) switch and a local exchange carrier (LEC) end office switch. A key point about telephone numbers that are used in the Type 1 interconnection arrangements is that they reside in the LEC switch as opposed to the WSP switch. Wireless telephone numbers that use Type 2 Wireless Interconnection Trunks actually reside in the wireless switches

transfer memo or pooling techniques may be done prior to November 24, 2003. Migration via porting may be completed after November 24, 2003. BellSouth is currently cooperating with sixteen CMRS providers that have elected to migrate their Type 1 numbers from Type 1 trunks to Type 2 trunks.

In September 2003, BellSouth launched instructor-led training classes to help CMRS provider customers implement new WLNP processes. The training focuses on how to complete LSRs and submit them successfully via BellSouth's web-based LENS system. The two-day course is designed to provide order entry personnel and customer-appointed trainers with relevant background materials and instructions. BellSouth had previously announced that it also would work with customers to test and validate their TAG or EDI electronic ordering interfaces beginning October 19, 2003.

In addition to direct mail, BellSouth has made the following efforts to work with CMRS providers in anticipation of the implementation of WLNP in November 2003:

- BellSouth distributed the Spring 2003 and Fall 2003 editions of the Better Connections Newsletter, an electronic newsletter sent directly to CMRS providers. These editions included detailed information on BellSouth's processes for handling WLNP.
- BellSouth has also had one-on-one customer meetings with our largest CMRS provider customers for the specific purpose of addressing such issues as how these customers would implement WLNP; how they would work with BellSouth; and how BellSouth proposed to handle Type 1 number migration.

2. Status of Inter-Company Testing Between BellSouth and WSPs

Verizon Wireless, in its September 23, 2003 response to the FCC on the status of WLNP, states that BellSouth has not agreed to any testing dates. BellSouth disagrees with this statement. Although actual testing has not begun, BellSouth has communicated to its wireless customers (including Verizon Wireless) that we will begin testing electronic ordering interfaces with wireless service providers on October 19, 2003. This date was communicated to our wireless customers in June 2003. This date was the earliest that the new ENCORE² release that supports WLNP would be fully installed and ready to test. BellSouth communicated this date on its website, which further described the steps that a CMRS provider must take to schedule testing with BellSouth. BellSouth also sent letters to its CMRS provider customers that contained the same information.

CMRS providers may also elect to engage an independent service provider or service bureau to perform some or all aspects of completing and submitting wireline-number

² BellSouth's Local Operations Support Systems are collectively referred to as ENCORE. ENCORE includes the EDI and LENS interfaces through which LECs and now CMRS providers obtain pre-order information about BST customers and submit LSRs, among others. ENCORE systems are updated at scheduled intervals to resolve defects and add new features addressed by the Change Control Process. BellSouth and its LEC customers use a consensus process to determine the timing and prioritization of changes to ENCORE systems. Metrics are used to measure BellSouth's success in responding to change requests and in implementing changes approved via the Change Control Process.

porting requests to BellSouth. Our Software Vendor Process (SVP) is designed to assist software vendors during their development of pre-order and/or firm order interface applications software and services for CMRS providers. BellSouth is presently scheduling testing with software vendors acting on behalf of several CMRS providers. Since BellSouth has received a letter of agency from an independent service bureau that is acting on behalf AWS, BellSouth would expect AWS's software vendor to contact BellSouth to schedule testing as other vendors are currently doing.

BellSouth has communicated openly and frequently with all CMRS providers about when testing can be done with BellSouth and how to schedule testing with BellSouth. CMRS providers and software vendors acting on their behalf are in the process of scheduling testing with BellSouth that will begin October 19th. To schedule testing with BellSouth, Verizon Wireless should contact BellSouth, just as other CMRS providers are doing now.

3. Status of Coordination Efforts Between BellSouth and Specific CMRS Providers to Facilitate WLNP

In its September 23, 2003 letter, AWS states that it has made extensive efforts to coordinate with the major wireline carriers to facilitate porting including the "negotiations of intercarrier agreements for the establishment of business arrangements and intercarrier communications processes for LNP." In particular, AWS notes on page 6 of its letter to Mr. Muleta that BellSouth has had a "continual change of position on the form of the LNP agreement that it would negotiate." This statement is not true. BellSouth did not and does not believe a service level agreement such as the document proposed by AWS is required or necessary for the implementation of WLNP between wireless and wireline companies. Nevertheless, BellSouth has reviewed the document proposed by AWS. BellSouth's position remains the same, that when there currently exists an interconnection agreement between the wireline service provider and the CMRS provider, the interconnection agreement can and should be used to specify the terms under which LNP between the two service providers will occur.

On September 4, 2003 BellSouth sent to AWS language that we proposed be added to the existing BellSouth-AWS interconnection agreement to address WLNP. Our proposed language modification, which is attached to this letter, is straightforward and, in BellSouth's view, much simpler than the multi-page document that AWS submitted. The AWS proposed language might be necessary in situations where no agreement presently exists. In this case, however, because BellSouth has existing interconnection agreements with most wireless carriers in its service area, including AWS, interconnection agreements present a simpler, more efficient vehicle for defining the parties' obligations with respect to WLNP. Furthermore, because, under the Commission's current rules, the existing LSR process and the existing wireline intervals will be used for ports involving wireline telephone numbers, only minor modifications are needed to existing interconnection agreements.

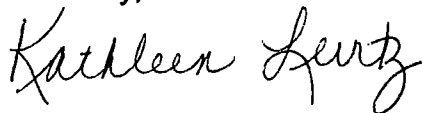
Finally, on page 9 of its letter, AWS expresses concern about testing with wireline service providers in the absence of any agreement. BellSouth will test with CMRS providers, or their software vendors, even in the absence of an amended interconnection agreement.

In summary, BellSouth would like to reiterate the following points:

- Through our carrier notifications and our WLNP website, BellSouth has been assertive in its efforts to give CMRS providers the necessary information needed to assure successful implementation of intermodal porting on November 24, 2003.
- Absent Commission permission to do so, BellSouth will not limit a CMRS provider's ability to port a wireline customer's telephone number to those rate centers within which that CMRS provider has numbering resources, even though this places BellSouth at a significant competitive disadvantage. We urge, however, that the FCC examine this issue, one that was first identified and brought to the Commission's attention over 5 years ago, by initiating a new rulemaking proceeding on the "disparity" issue and defer intermodal porting until the FCC addresses this and related issues.
- BellSouth is adhering to the wireline porting processes, flows and intervals as originally adopted by NANC and subsequently codified by the FCC in Section 52.26(a) of its rules.
- BellSouth will test with CMRS providers beginning October 19th on a first come, first served basis;
- A Service Level Agreement (SLA) is not needed when the wireline service provider and the wireless service provider have an *existing* interconnection agreement. A SLA may be appropriate in situations where no current agreement exists.

I am filing a copy of this letter and its attachments electronically with the Commission's Secretary and have requested that she place it in the record of this proceeding. I hope that you will call me at 202.463.4113 if you have any questions related to this letter.

Sincerely,



Attachment

cc: Chairman Powell
Commissioner Martin
Commissioner Copps
Commissioner Adelstein
Commissioner Abernathy
Dan Gonzalez
Sam Feder
Barry Ohlson
Lisa Zaina

William Maher
Carol Matthey
Cheryl Callahan
Eric Einhorn
Jennifer Salhus
Pamela Slipakoff
Jeffrey Dygert
John Muleta
Jared Carlson

**Scott Bergmann
Jessica Rosenworcel
Jason Williams
Jennifer Manner
Matthew Brill
Bryan Tramont
Christopher Libertelli
Sheryl Wilkerson**

DRAFT 8/28/03

XII. Local Number Portability

A. The parties agree that the Industry has established Local Routing Number ("LRN") technology as the method by which Local Number Portability ("LNP") will be provided in response to FCC Orders in Docket 95-116.

B. The Parties agree to provide LNP as required by relevant FCC orders, within and between their respective networks no later than any revised deployment schedule established by the FCC under Part 52 of the FCC's Rules (47 CFR Part 52), or in other applicable FCC orders and rules.

C. Industry guidelines shall be followed regarding all aspects of porting numbers from one carrier to another, including, but not limited to, NANC Local Number Portability Interservice Provider Operation Flows.

D. The Parties shall, as required by FCC orders, disclose upon request any technical limitations that would prevent LNP in any connecting office within the most current MSA to which they provide service.

E. Prior to November 24, 2003, the Parties will work together to migrate telephone numbers assigned to Type 1 trunks in 10K or 1K blocks from BellSouth's switch to the wireless service provider's switch. After November 24, 2003, Parties will cooperate to migrate numbers assigned to Type 1 trunks in blocks of less than 100 to the wireless service provider's switch. This may include LERG reassignment, transfer of ownership of a block, or porting of individual numbers.

F. A telephone number can only be ported from a wireline carrier to a wireless carrier if the rate center associated with the NPA-NXX is within the wireless provider's license area. A telephone number can only be ported from a wireless carrier to a wireline carrier if the customer's service address is within the rate center associated with the customer's NPA-NXX, as approved by the appropriate state regulatory agency.

G. Both Parties agree to work expeditiously to resolve any issues associated with porting a customer between the two Parties. Before either Party reports a trouble condition, that Party must first use reasonable efforts to isolate the trouble to the other Party's actions or facilities.

H. The Local Number Portability (LNP) Bona Fide Request (BFR) is a process that both wireline and CMRS carriers shall use to request that LNP be deployed in a Metropolitan Statistical Area (MSA) beyond the 100 largest MSAs in the country. As and when required by FCC orders or rules, the Parties will ensure that all switches in the FCC's most current Top 100 MSA list are LNP

capable. As permitted by FCC orders or rules, a BFR may be used to request LNP in any MSA outside the FCC's most current list.

I. Transaction fees associated with wireline porting are as follows: for LSRs submitted to BellSouth via electronic ordering interface such as LENS, EDI, or TAG: \$3.50 per LSR. For LSRs submitted to BellSouth via FAX: \$ 19.95 per LSR. Prior to ordering, Carrier will establish a Miscellaneous Billing Account with BellSouth. Transaction fees will be billed to this account

J. The parties agree to utilize the porting guidelines and processes as outlined on the BellSouth Interconnection web site, as amended from time to time. The WLNP Reference Guide ~~(and any subsequent updates)~~, incorporated herin by reference, is accessible via the Internet at the following site: <http://www.interconnection.bellsouth.com>. The Parties agree to work cooperatively to implement changes to LNP process flows ordered by the FCC or as recommended by standard industry forums addressing LNP.